INSPECTION REPORT:
BY W. Douglas Smith,

Enforcement Sensitive

Tue, Aug 3, 1993

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ESD
RCRA INSPECTION REPORT

MAPCO Alaska Petroleum Inc.

1100 H. & H. Lane
North Pole, AK 99705

ENFORCEMENT SENSITIVE

5/10-14/93

FACILITY ADDRESS: **MAPCO Alaska Petroleum Inc.**
1100 H. &. H. Lane
North Pole, AK 99705

SITE ADDRESS: **MAPCO Alaska Petroleum Inc.**
1100 H. &. H. Lane
North Pole, AK 99705

RCRA Identification number: **AKD000850701**

INSPECTION COMMENCED: 5-10-93 @ 1400 hours. The inspection closed out 5-14-93.

SITE CONTACTS: Kathleen McCullom, Environmental Coordinator
David Rowse, General Manager, (907) 488-2741

INSPECTION TEAM:

IMAGED

EPA team members:
Daniel Tangarone, Team Leader, Environmental Engineer
Douglas Hardesty, Environmental Engineer
Andrew Hess, EPS

W. Douglas Smith, Senior Compliance Investigator

ADEC team members:
Jack Coutts, Air program, (907) 451-2132
Don Gibbler, UST
Kristen DuBois-Goodwin, RCRA, (907) 451-2131
Vanessa Blevins, Environmental Engineer, waste Water, (907) 451-2170

COMPLIANCE BACKGROUND:

Under normal operations, Mapco Alaska Petroleum Inc. is a small quantity generator (SQG) of hazardous waste as a result of the petroleum refinery activities. Periodically the facility may exceed the SQG generation category due to maintenance or a spill.

Additionally, on March 5, 1987 a non-notifier Compliance Evaluation Inspection revealed numerous hazardous waste management violations, including illegal disposal of hazardous waste. As a result an EPA 3008(a) Complaint and Compliance Order was issued on January 27, 1988 and the Final Order was signed on January 6, 1989. The Final 3008(a) Order carried an $80,000 penalty. The facility also signed an 3008(h) Administrative Order of Consent on January 6, 1989. The 3008(h) order identified Tank 192, Lagoon B, the boneyard, and sumps 901, 905, 909-b and 05-7 as units which had received hazardous waste and were subject to corrective action. Consequently Mapco is pursuing clean closure of these units and is also treating petroleum contaminated groundwater. Mapco submitted closure certification to EPA in October in 1991 to demonstrate compliance with the closure requirements for he units addressed in the 3008(a) Order and their approved closure plans. As of the date of this report the closure certification has not been reviewed and approved by EPA or the State.

In addition, due to numerous petroleum spills at the facility, in November 1986, Mapco entered into a Compliance Order by Consent with ADEC which directed the facility to continue oil

spill and groundwater cleanup at the North Pole facility. Presently, a groundwater recovery, pump and treat system is in place. Fuel fractions are removed from the groundwater and recycled into the refinery process. The remaining water fraction, with benzene concentrations of 300-400 ppb, is treated in air stripping units prior to discharge to a gravel pit. The waste water discharge is covered under an ADEC waste water discharge permit. Waste water benzene discharge levels must not exceed 5 ppb.

It is the facility's position that Mapco is a generation of hazardous waste and should not be considered an interim status facility under RCRA. Language in the March 21 1989 RCRA CEI indicates that EPA concluded the facility should be viewed as a generator of hazardous waste and not a treatment, storage or disposal facility. However, Mapco is still subject to the EPA Orders which include some TSD requirements.

The last EEI at Mapco to determine the facility's full compliance with the EPA 3008(h) and (a) Orders occurred on June 21, 1990. The July 29, 1991, June 25, 1992 and this inspection led by EPA mainly evaluates the facility for compliance with the hazardous waste generator requirements.

SITE BACKGROUND:

Location:

"The North Pole refinery occupies 40 acres off the Old Richardson Highway near North Pole, Alaska, located in the southeast corner of Section 16, Township 2 South, Range 2 East which is leased from the State of Alaska (Lease No. 50824).

The refinery is located on the floodplain alluvium of the Tanana River, whose nearest channel is located about one-quarter mile southwest of the southwest corner of the site. In this region the river trends about North 45 degrees West. The refinery is separated from the Tanana River by the Tanana Levee, which is part of the Chena Lakes Flood Control Project.

The groundwater aquifer is located 3 to 10 feet below the ground surface. The aquifer is both a sensitive environmental zone, and an area of public concern because the North Pole refinery is located up gradient of the city of North Pole and their potable water wells."

(NOTE: The property occupied by MAPCO actually consists of 240 acres leased from the State of Alaska. The ponds, hazardous waste storage area, bone yard and some storage areas extend considerably beyond the 40 acres described in their contingency plan.)

Climate:

"Located approximately at the 65th parallel, the area is surrounded by mountain ranges, and is well sheltered from maritime influences. The area consequently has a definite subarctic, continental climate. This climate is characterized by long, cold winters with short days, and short warm summers with nearly continuous daylight. The National Weather Services maintains a data collection station at the Fairbanks International Airport. Weather records kept since 1904 exhibit an extreme range of temperatures. The minimum recorded temperature is -65° F, and the maximum is 99° F, and the mean annual air temperature is 25° F."

This description was taken from Section 2 of the facility Oil Spill Contingency Plan (1988 edition).

Products produced by MAPCO are marketed in Alaska.

"The plant uses the basic refinery process of distillation to separate the crude oil into its various fractions. In addition, the plant employs an extraction unit to selectively separate the high octane components of the crude to produce gasoline. Unlike larger, more complex refineries, the plant does not employ the use of cracking or other conversion processes to form new compounds by changing the molecular structure of the

hydrocarbons received in the crude oil. A portion of the feed stock is unused, and is returned to the Trans Alaska Pipe System (TAPS) pipeline.

The refinery process include desalting, crude atmospheric distillation, vacuum distillation, and aromatic extraction. The desalting process removes salt, water and other impurities from the crude oil before it is charged to the crude distillation towers. In the atmospheric distillation towers the crude is separated into gas, naphtha, distillates, gas oil, and reduced crude. The reduced crude is charged to the vacuum distillation unit to produce asphalt. The naphtha and light distillate is charged to the extraction unit to remove a high octane gasoline blend stock.

By means of blending, several finished products are produced from these process streams. Gasoline, both leaded regular and unleaded regular, military jet fuel, commercial jet fuel, No. 1 and No. 2 heating fuels, No. 1 and No. 2 diesel fuels, industrial turbine fuel, and asphalt road oil are the products marketed from the facility.

The refinery is a continuous process and is therefore in operation 24 hours per day, 365 days per year. Process unit shutdowns for inspection and repair are scheduled on three year cycles and are staggered to maintain continuous operation.

Also located on the site are two 65-MW gas turbine electric generating units owned and operated by Golden Valley Electric Association. Fuel for these units is supplied from the North Pole refinery."

The previous statement was taken from Section 3 of the Oil Spill Contingency Plan. An excellent general explanation of the Refinery Operations may be found in Section 3.2 of the same Contingency Plan.

Total aggregate storage capacity is 500,000 barrels of petroleum product in 26 storage tanks. All tanks except T-201 was constructed on gravel foundations within the containment area. Tank T-201 is mounted on reinforced concrete saddles.

Exceptions to above ground piping are the oily water collection drains which run from the containment areas to the sumps within the plant. The sumps themselves are steel and more than half buried in the soil. Pipes crossing roads are subgrade and insulated with cathodic protection. Incoming crude and out going product pipelines are installed below grade with corrosion protective wrappings and cathodic protection." The above information was excerpted from the 1988 Contingency Plan.

Mr. Rowse, General Manager stated that there are no chemical reactions that occur in the plant process. He further stated that the total throughput is approximately 125,000 bbls/day, of which 35/40% is retained and produces product. He said that approximately 60% of the product is shipped out by rail and local sales are shipped by truck. He said, "the process is a solvent extraction using Sulfolane." Sulfolane is a product produced by Shell Oil or Phillips Petroleum.

Many wastes generated in the production of product are placed back into the pipe line. Exceptions are heat exchanger bundle sludge (K050) and desalter wastes produced during change outs which are manifested and disposed of as hazardous wastes.

OPENING CONFERENCE:

On May 10, 1993, Dan Tangarone conducted the opening conference for the inspection team. Inspection team members presented their credentials to representatives of the plant present at this meeting. The principal facility representatives were Kathleen McCullom, Environmental Coordinator and David Rowse, General Manager, (907) 488-2741. Mr. Tangarone introduced and explained the roles for each inspector. Mr. Tangarone then outlined the scope and sequence intended for the inspection. Mr. Rowse said that it would be permissible to use the video camera during the inspection and requested a copy of the tape after case review by the various program offices.

RECORDS INSPECTION:

Attachment "D" is the Multi-Media "Request for Documents" sent to the facility by Barbara Lither, Compliance Program Manager prior to the commencement of this inspection. Applicable documents that were necessary to copy and review later are attached to this report under the title "Facility Documents" (See Attachments section at end of this report).

Ms. DuBois-Goodwin and I reviewed manifests generated since 1988. We found some manifests without the Item #16 waste minimization certification. See attachment " " for samples of manifests. Land disposal restriction notifications accompanied all manifests.

The facility had the past three annual and biennial hazardous waste reports on-site.

We reviewed the SPCC and 1989 Oil Spill Contingency Plan.

Discrepancy in number of sumps indicated:

We reviewed the contingency plan and identified where sumps were located. The contingency plan identified 24 sumps in the text but the diagram referenced indicated 27 sumps. Ms. McCullom did not know which was accurate. (See video footage 243-520) The sumps are not underground tanks and are exempted from Underground Storage Tank regulations.

Ms. DuBois-Goodwin and I reviewed the training program and observed the computer tracking system maintained by John Taylor, Safety Officer. Mr. Taylor reviewed the mandatory training and all subsequent training. We chose an employee at random and reviewed the records on Jeane Brodie. The records indicated that she had completed all the training outlined by Mr. Taylor. Safety and Hazardous waste training at the facility appeared to be comprehensive and thorough documentation is kept.

We also discussed emergency procedures with Mr. Taylor. According to Mr. Taylor, he is the primary emergency coordinator and is on call 24 hours a day. Ms. McCulum is the secondary contact. Emergency contact names and telephone numbers are posted next to the phone in the Operations Center which is manned 24 hours a day. The Operation Center also has a hotline to the fire department. Mr. Taylor stated that Mapco has a mutual aid agreement with the City of North Pole fire Department. Additionally, there are 22 Mapco employees that are part of the facilities own fire brigade. Mapco has a fire truck on-site that is equipped with AFFF foam that can tie into the facility's water/foam system that surrounds the process and tank farm areas. Approximately 200 portable fire extinguishers are stationed throughout the facility. There are 16 audible alarm points in the process area and 50% of Mapco employees carry two way radios.

We requested proof of financial assurance as required by the 3008(a) Consent Agreement. Ms. McCullum stated that she thought the financial assurance demonstration was a one time requirement. This same potential violation was noted by EPA during the 1992 CEI, however no enforcement action was taken at that time.

I requested information regarding the change out of heat exchangers and the disposal of the K050 heat exchanger sludge. We were not provided any written documentation at the time of this inspection. The request was repeated at the close out on 5-13-93.

FIELD INSPECTION:

The following locations were observed during this inspection:

1. Control Room
2. Desalters
3. Groundwater Air Strippers
4. All pumps
5. Wastewater Lagoons (A & C)

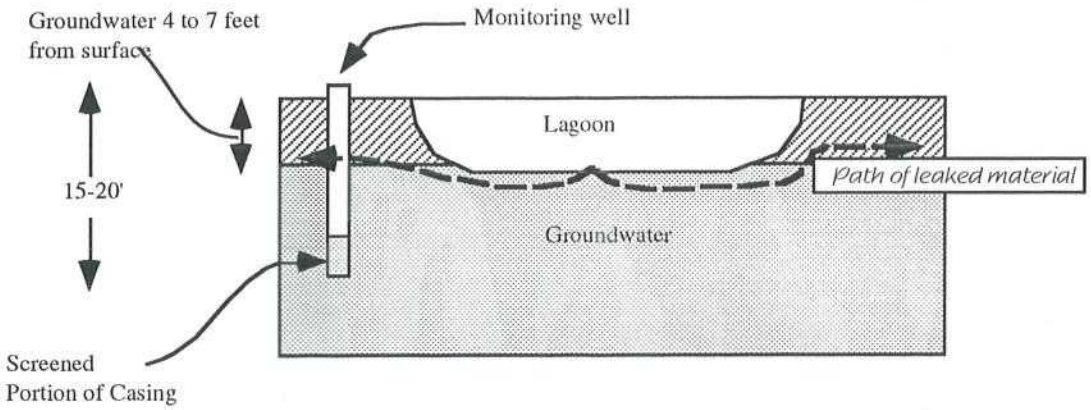
6. Pad with heat exchangers near RR tracks
7. Hazardous Waste Storage Area
8. Laboratory
9. Fire Training Pit
10. Bone Yard
11. Fleet vehicle fuel loading area
12. Tetraethyl lead room
13. Safety office
14. Fire response building and pumper truck garage
15. Contractor work and several storage in converted 100,000+ gallon bolted tanks
16. Process area
17. Administrative offices
18. Part of the RR loading area
19. The majority of the Tank Farm

WASTE WATER LAGOONS A & C:

Waste water from the refinery processes and storm water drains are processed through Tank 192, a gravity separation unit. Recovered petroleum is returned to the refining process. Waste water from Tank 192 with benzene concentrations of approximately 14 ppm, is treated in the process air strippers, discharged to aeration Lagoons A & C with benzene levels at approximately 20 ppb then discharged to the City of North Pole Waste water treatment facility.

I asked Ms. McCullom to explain the monitoring system for the lagoons. She said that the ground water varies between 6 and 7 feet. I obtained information from the state indicating that it may be as high as four feet several times a year. Ms. McCullom said that the monitoring wells are screened at 15 to 20 feet from the ground surface. She said that the monitoring wells have not indicated any leaking or contamination that exceeded the 5 ppb benzene. I asked her if there was any concern that contamination from the lagoon might float on the ground water and escape undetected in the 4-7 foot zone and that her monitoring wells might not detect it because they were screened far below the surface of the ground water. See diagram of my hypothesis:

Theoretical petroleum contaminant leak:



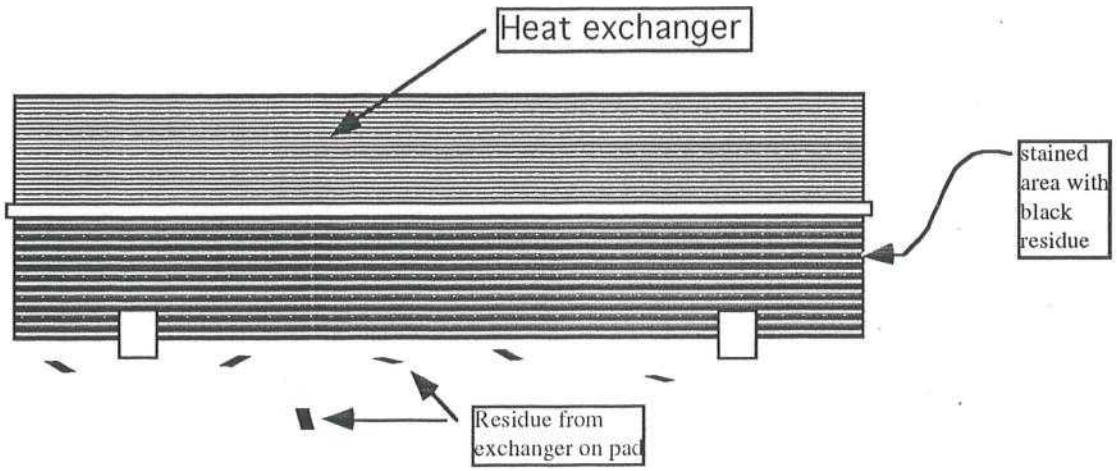
Ms. Blevins and I thought that it might be possible for sludge to build up in the bottom of the lagoon. A leak in the bottom of the lagoon might have oily residues that might be heavier than water as sludge but might float if disturbed by movement. I asked Ms. McCullom if she felt satisfied that her wells would detect all leaks from the lagoons. She said that she had complete confidence.

Heat Exchanger Storage Area:

On a pad next to the railroad tracks and adjacent to lagoon A, I observed two heat exchanger bundles (See video footage 205-243 and 1909-2022) The larger of the two units was darker on its bottom half. I asked Ms. McCullom how the units were removed. She said that they were pulled and the dripping K050 waste was collected and shipped as hazardous waste. I asked her if the units had been pressure washed or cleaned. She said that she didn't know. I then looked closely at the units and determined that the bottom half of the larger unit appeared to have a residue like black soot. This material may be scorched Sulfaline used in the heat exchangers. The residue on the bottom portion and a comparison with the rusted upper portion is clearly shown in the video tape (see video footage 1909-1022). Heat exchanger bundle sludge is a listed K050.

NOTE: In a May 24, 1993 telephone conversation with Ms.

Dubois-Goodwin, Ms McCullam stated that the units had been steam cleaned prior to removal and placement on the pads.



Ms. McCullom thought that the two heat exchangers on the pad were changed out in the fall or late summer of 1992. I observed at least 6 other heat exchangers of similar size on the west side of lagoon C (approximation). I asked her how long those units had been stored and she thought that they had been there about the same time. She said that they were determining costs for waste disposal, scrapping or rebuilding. She said that she would provide documentation of their final disposition.

Hazardous Waste Storage Area:

The hazardous waste storage area was secured with a chain link fence with a locked gate. There were warning signs. The drum pad was constructed of concrete with a blind sump and a ramped berm. There were six containers stored on the pad. All were labeled with the words "Hazardous Waste", had accumulation start dates and none were leaking. None of the material had been in storage more than 30 days. (See video footage 1626-1807) Ms. McCullom stated that the area was inspected on a weekly basis.

Fire Extinguishers:

The RCRA inspection team walked through parts of the tank farm and process area. Of the areas visited only two fire

extinguishers observed had labels indicating they had been inspected more recently than 1991. There were at least a dozen portable fire extinguishers that had expired inspection dates. The only fire extinguisher in the Tetraethyl lead room had a label indicating that it had last been inspected in May 1991. These units were both liquid and dry types. (See video tape footage 1151-1210, 1210-1233, 1326-1340, 1340-1358, 1358-1413, 1413-1428, 1428-1500, 1500-1526, 1827-1845, 1845-1902, 1902-1909) The significance of not having inspected and certified workable fire fighting equipment was emphasized when it was learned that the emergency notification system for the tank farm area consists of portable radio communication (walkie-talkie) or voice. We walked for nearly an hour without encountering anyone with a walkie-talkie and if an emergency would have happened we would have had to walk as much a 1000 feet to get to assistance and the alarm system. It would not have been difficult for an employee to have been injured and not be discovered for half an hour or longer. In the same vein it would not be difficult for a fire to start concurrently (such as in a welding operation or vehicle accident) with that injury and not be reported until other piping and tankage had become involved. Single employees were observed walking throughout the plant that did not have walkie talkies. Some of these employees were in areas so remote that voice or sight communication would have been difficult or impossible.

Hazardous waste in 55-gallon trash drum that was not satellite accumulation:

Near fire extinguisher #219 there was a trash drum with three spray paint cans in it. (See video footage 1526-1541) The small quantity of hazardous waste (i.e. toluene, thinners, etc.) in each can was minimal but other spray paint cans could be disposed of in a similar manner. It appeared possible that these trash drums could receive spent pressurized paint cans and other hazardous waste generated in the yard or tank farm area. There were dozens of these drums scattered around the facility.

Laboratory :

The laboratory was well organized with an accumulation container immediately outside the rear door. The 10 gallon

container was marked with the words "Hazardous Waste", and had an accumulation start date. The container had broken mercury thermometers in it. Ms. McCullom stated that the Hazardous Waste accumulation area was inspected on a weekly basis.

According to Ms. McCullum, all sinks and floor drains eventually discharge to Tank 192, the air strippers, Lagoons A & C, and the City of North Pole for treatment. Ms. Jean Brodie informed the inspectors that chlorinated compounds are not used in the lab. However, other spent solvents used in the laboratory are discharged down laboratory sinks. Ms. McCullum explained that solvents used in the lab were normal constituents of the crude steam and would be diverted back into the petroleum refining process via Tank 192. She also stated that Lagoon C's waste water discharge to the City of North Pole must meet pretreatment standards as set by NP's quasi-NPDES permit. (See video footage 1244-1321)

Liquid in solid waste container:

There was a spring lid waste can with "Oily Rags Only" written on the lid. It was partially filled with an unidentified liquid. (See video footage 1808-1827) There were no rags or other wastes in the container.

CLOSING CONFERENCE:

The close out took place in the administration building on 5-13-93. Ms Dubois-Goodwin was not present at the closeout. I stated that there were concerns regarding hazardous waste accumulation and storage and gave the K050 heat exchanger waste as an example. I further stated that there might be some concern about the lack of verifiable fire protection in the yard and tank areas. I identified a scenario where it was potentially possible for a worker to have an accident and not be able to alert others in an expeditious manner. I requested more information regarding the time the heat exchangers had been stored in the

yard, how they had been cleaned during removal and what they planned to do with them.

ATTACHMENTS:

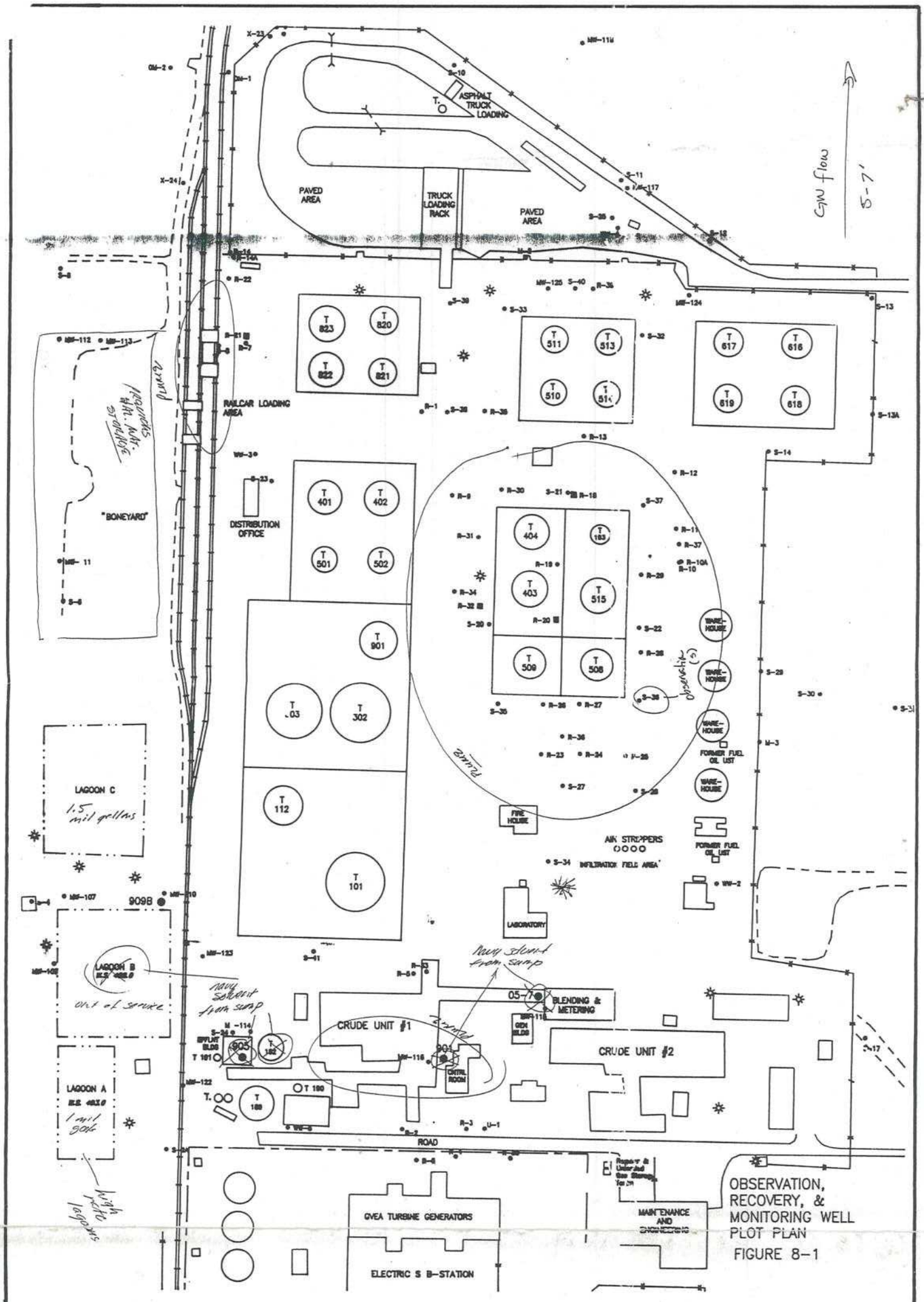
A. Notices of inspection
B. Notebooks
C. Video tape & Photographs
D. Facility documents
   1 Copy B. Lither's Document Request Form and Notice of Inspection
   2 Site Diagram
   3 Eilo 1992 inspection report copy
   4. Mapco Annual Report for 1992
   5. Mapco Manifests
   6. Mapco 1987 Hazardous Waste Generation and Shipment Report
   7. Certificate for Proof of Financial Responsibility with attached letter from Glenn Adams and supporting documents.

Aug 3 1993 _____
DATE W. Douglas Smith, Sr. Compliance Investigator

In concurrence with:

_____ _____
DATE Kristen DuBois-Goodwin

Attachment "D2"



640 acres
40 acres plus
27 m.w.
140 recovery wells
7 monitor
500-1000 gal
work
product recovery

United States Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle WA 98101
Alaska
Idaho
Oregon
Washington

EPA

DRAFT

DRAFT

VIA FAX
and
HAND DELIVERED

Fax Petro 488 3055
Maps: FAX - 488-0032

ENFORCEMENT CONFIDENTIAL

Reply to
Attn of: OR-075

Douglas
Mr. Chapados
NP Refinery Manager
Petrostar Inc NP Refinery
1120 Hi H Lane
North Pole, Alaska 99705

Re: Request for Information Pursuant to Multi-Media Inspection at Petrostar, Alaska

Dear Mr. :

The U. S. Environmental Protection Agency (EPA) Region 10, will conduct a multi-media inspection of the Petrostar, Alaska facility beginning on May 10, 1993. Inspectors from the State of Alaska, Department of Environmental Conservation (ADEC), will also be participating. The inspection and this Request for Information are authorized pursuant to EPA regulations and Federal environmental statutes, including but not limited to:

* Section 114(a) of the Clean Air Act, 42 U.S.C. §7414(a)

* Section 308(a) of the Clean Water Act 33 U.S.C. §1318(a)

* Section 11(a) and (b) of the Toxic Substances Control Act, 15 U.S.C. §2610(a) and (b)

* Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. §6927(a)

* Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §9604(e).

The purpose of the inspection is to determine compliance with applicable environmental statutes, regulations, rules, decrees, approvals and permits. A list of records and documents needed by our EPA inspectors is attached. We believe that many of these records are, or should be, readily available at your

facility. In order to provide you with advance notification of this Request for Information, we are faxing this request to you on May 7, 1993. We hope this lead time will allow you to have the requested documents available for our review beginning on May 10, 1993.

Compliance with this Request for Information is mandatory. Failure to respond fully and truthfully to this Request for Information can result in an enforcement action by EPA seeking the imposition of substantial penalties. In addition, provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001 and other relevant statutory authorities.

Pursuant to 40 C.F.R. §§ 2.201-2.311 (41 Fed. Reg. 36902 as amended), you may assert a business confidentiality claim covering any portion of the submitted information which is entitled to confidential treatment. Special rules governing certain information obtained under each statute appear in 40 C.F.R. § 2.301-2.310. Failure to assert a claim in the manner described in 40 C.F.R. § 2.203(b) allows the submitted information to be released to the public without further notice. Information subject to a business confidentiality claim may be disclosed by EPA only to the extent set forth in the above-cited regulations.

If you have questions about the legal aspects of this Request for Information, please contact Jackson L. Fox, Regional Counsel, at (206) 553-1073. Our technical contact for this inspection is Andy Hess of our Environmental Services Division at (206) 871-8711 and Leslie _____, ADEC, at (907) _____.

We thank you in advance for your cooperation.

Sincerely,

Dana A. Rasmussen
Regional Administrator

Enclosure

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United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

Alaska
Idaho
Oregon
Washington

EPA

DRAFT

DRAFT

VIA FAX
and
HAND DELIVERED

Reply to
Attn Of: OE-075

FAX
488-0032

David Rousse

Mr. ~~Gerald Fritz~~
General Manager
Mapco Alaska Petroleum, Inc.
1100 H & H Lane
North Pole, Alaska 99705

Re: Request for Information Pursuant to Multi-Media Inspection at Mapco Alaska Petroleum Inc., North Pole, Alaska

Dear Mr. Fritz:

The U. S. Environmental Protection Agency (EPA) Region 10, will conduct a multi-media inspection of the Mapco Alaska Petroleum, North Pole, Alaska facility beginning on May 10, 1993. Inspectors from the State of Alaska, Department of Environmental Conservation (ADEC), will also be participating. The inspection and this Request for Information are authorized pursuant to EPA regulations and Federal environmental statutes, including but not limited to:

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* Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. §6927(a)

* Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §9604(e).

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If you have questions about the legal aspects of this Request for Information, please contact Jackson L. Fox, Regional Counsel, at (206) 553-1073. Our technical contact for this inspection is Dan Tangarone of our Environmental Services Division at (206) 553-1630 and ~~Chris~~ DuBois, ADEC, at (907) 451-~~2112~~ 2200 Kristen Goodwin

We thank you in advance for your cooperation.

Sincerely,

Dana A. Rasmussen
Regional Administrator

Enclosure

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RECORDS/DOCUMENTS REQUEST

GENERAL PROCEDURE

The NEIC records evaluation generally will proceed in two stages. First, NEIC will identify various records to be reviewed. The following documents are requested to be made available for review during the inspection. Generally, these records will date back three years from the present but some of the records will be for specific time periods. Second, according to a schedule to be developed on-site, NEIC will review the records and request copies, as needed.

Bold

Bold - Some of these documents may not be applicable to your facility.

GENERAL

1. Facility map and plot plan
2. Organizational chart
3. Description of facility and operations

CLEAN AIR ACT (CAA)

1. Plot plan of the facility showing location and identification of all major process area and stacks

2. Brief descriptions for all process areas to include:

   (a) simplified process flow diagrams
   (b) pollution control equipment

3. Permits and/or variances for air emission sources and related correspondence

4. Consent Decrees/Orders/Agreements still in effect or completed within the last 3 years

5. Sulfur in fuel records for boiler/space heater fuel

6. Stack tests (most recent) and continuous stack and ambient monitoring data (last 2 quarters)

7. Design data, calibration procedures, and performance specification tests for continuous emission monitors

8. Process and/or control equipment records required by permit

9. Procedures/manuals for the operation and inspection of pollution control equipment

10. Required notices for asbestos demolition/renovation projects in progress or completed within the last three years

11. Provide 1990 and 1991 State emissions inventory report. Describe the method by which the total emissions were determined including emission sources. If estimates have been made show calculations and assumptions. Testing is not required to determine total

emissions. Provide emission data from process vents, fugitive emissions, and storage tanks.

12. Notices of Non-Compliance and related correspondence for the past three years.

13. Excess emission reports for the past three years

14. A list of all boilers, recovery furnaces, incinerators, and other emission sources to include location, identification number, heating capacities, fuel type, and sulfur fuel content

15. A list of air pollution control equipment and sources controlled and/or vented

16. Monthly and quarterly reports submitted to the State for the past three years

17. Studies required by State and/or permits

18. PSD and NSPS permit application(s)

19. Annual volatile organic compound emissions from the facility including associated VOC storage tanks (last 2 years). Describe method(s) used to determine emissions. If estimates have been made show calculations and assumptions.

20. List other air pollution sources, not covered in above items, such as combustion units larger than 2.5 million BTUs/hr heat inputs

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

1. List of description of all hazardous waste storage areas, including above and below ground tanks, temporary tanks, drum storage areas, pits, ponds, lagoons, waste piles, etc., that have been operated at any time since November 1980.

2. RCRA Part A Permit Application

3. Manifests for all off-site shipments of hazardous waste, including notifications and certifications for Land Disposal Restricted (LDR) hazardous waste.

4. Determinations, data, documents, etc., supporting the facility's decision that wastes are hazardous, non-hazardous or LDR hazardous wastes for all solid wastes, as defined under RCRA. Also provide information used in the determination of the EPA hazardous waste codes applied to all hazardous wastes.

5. Notices to the owner or operator of the disposal facility receiving waste subject to land disposal restrictions

6. Schedule and inspection logs for inspection of safety and emergency equipment, security devices, monitoring equipment, and operating and structural equipment

7. Satellite accumulation area inspection records

8. Employee training records for hazardous waste handlers, including job title and description, name of each employee and documentation of the type and amount of training

each has received.

9. Current Contingency Plan

10. Current Closure Plan

11. Copy of the Waste Analysis Plan (WAP) currently in use and effective date of the plan. If the current WAP was not effective on January 1, 1986 provide copies of all WAPs and revisions.

12. Narrative of procedures used to store hazardous wastes prior to shipment off-site for treatment, recycle, reclamation and/or disposal. Include a list of all storage and satellite storage areas and the quantity of waste stored at each area.

13. Summary reports and documentation of all incidents that required implementation of the contingency plan for the past 3 years

14. The Generator Biennial and Exception Reports

15. Reports and analytical results of any groundwater quality and groundwater contamination surveys

16. Closure plan for units undergoing closure

17. Inspection schedule(s) for all hazardous waste management units, such as storage areas and tank systems, and all inspection logs, remediations document, etc. for the last three years.

18. Description of the hazardous waste minimization plan

19. Copy of the annual report for the last three years

20. Copy of notification to EPA of hazardous waste activity to secure generator ID number

21. Copy of Clean Closure Demonstration, if any.

22. List of all identified or suspected Solid Waste Management Units on the facility's property

23. List of all locations where hazardous wastes are generated including types, quantity, and EPA hazardous waste codes of wastes

24. Notification of any releases to the environment and follow-up reports

25. Notifications for underground storage tanks

26. Copies of any written tank integrity assessment certified by a professional engineer

27. Agreements with local emergency response authorities or documentation of refusal by the emergency response authorities to enter into such agreements.

28. Design specifications for any underground storage tanks installed after May 1985

29. Characteristics of materials removed from facility septic systems, including analytical results.

TOXIC SUBSTANCES CONTROL ACT - PCB WASTE MANAGEMENT

1. Copies of the "Annual Document" required by 40 CFR 761.180(a) for the last three years.
2. Records of monthly inspections of storage areas subject to 40 CFR 761.65
3. The SPCC plan prepared for storage areas subject to 40 CFR 761.65
4. All spill reports
5. Records of inspection and maintenance for PCB transformers for the last three years.
6. Transformer inventory and PCB analyses.
7. Reports or other documentation identifying the extent of any PCB spills and any remediation plans
8. Certifications of Destruction for PCB Transformer disposal
9. Manifests for PCB items shipped off-site

CLEAN WATER ACT (CWA)

1. Current NPDES permit applications including industrial, sanitary, and stormwater permits, and any information on changes in process wastestreams since permit application submittal.
2. NPDES permits effective during the last three years.
3. Exceptions/exemptions from current NPDES permit requirements
4. Copies of all reports/plans required by any NPDES permit including: best management plans (BMPs), water quality impact assessments, toxicity studies, sludge management plans, spill plans, etc.
5. Any compliance order, schedule, penalty assessment, citizen suit notice or action, or other enforcement actions within the last three years, and related correspondence.
6. Discharge monitoring reports (DMRs) for last three years and any raw data on which the reports are based. Written calibration procedures for flow measuring and recording equipment for any industrial, storm, sanitary, or other sewers on the facility. The written sampling/preservation/chain of custody procedures should also be provided.
7. Any correspondence regarding exceedances of discharge limitations during the last three years. All documents regarding spills or unintentional discharge of pollutants whether or not through a permitted outfall.

8. Any correspondence regarding spills, bypasses or upsets during the last three years

9. Most recent inspection report and response

10. All plans and/or written description of the sewer system (including by-pass capability), outfall locations, and monitoring stations

11. Description of any industrial wastewater treatment plants (IWTP) including schematic diagrams which include any process changes since submittal of the NPDES permit

12. Copies of any IWTP operation and maintenance plans, manuals, and log books

13. Identify all septic systems, including those no longer in service

14. Current SPCC plan (required by 40 CFR 112)

EMERGENCY PLANNING COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)

1. Notifications to the State Emergency Response Commission

2. Designated facility emergency coordinator

3. Written follow-up emergency release notifications

4. Material Safety Data Sheet reports to the State and local emergency planning Commissions and fire department

5. Tier I/Tier II submittals to the State and local Emergency Planning Commissions and/or fire department

6. EPA Form R submittals for the past three years

7. Documentation supporting the Form R submittals for the past three years

APR-28-93 WED 10:21 ADEC NRO FAX NO. 4512187 P. 01

attachment "D"

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
NORTHERN REGIONAL OFFICE
1001 NOBLE STREET, SUITE 350
FAIRBANKS, ALASKA 99701

(907) 451-2360

FAX # 451-2187

Sent to: Doug Smith

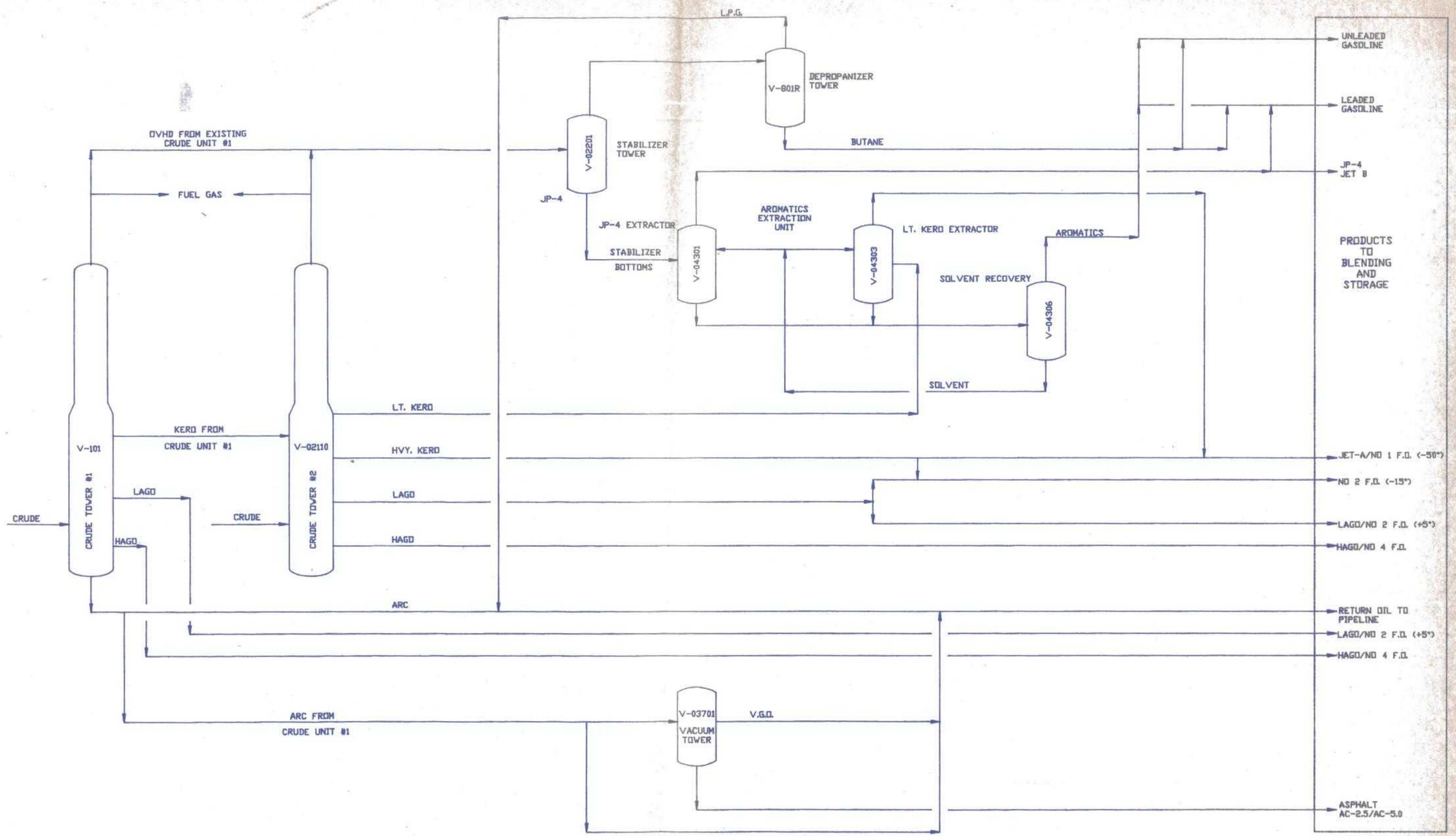
From: Kristen DuBois (Goodwin)

Subject: Multi-media inspection letter

Date: 4/28/93 Pages to Follow: 9

Doug- I did not receive the RCRA info request for other facility. Most of the info request documents will not be applicable to Petro.

EPA
5/13/93
141



REFERENCE DRAWINGS			REVISIONS					ISSUE RECORD					
REF NO.	TITLE	DRAWING NO.	REV	DATE	BY	APPR	DESCRIPTION	ISSUE NO	DATE	REV	TO	FOR
			1	8/30/84	PD	LVH	REDRAWN ON HOOD					
			2	10/2/84	LVH		REDRAWN ON ACAD					

MAPCO INC.

MAPCO ALASKA PETROLEUM INC.
NORTH POLE REFINERY
NORTH POLE, ALASKA

SIMPLIFIED PROCESS FLOW

PROJECT NO.		SCALE	N.T.S.
PROJECT		DATE	8/30/84
DRAWING NO.	D-00-F1019	REV.	1
		DRAWN	PAT D
		CHECKED	LVH

United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

1. Investigation Identification			2. Firm Name
Date: 5/13/93	Inspector No.: 3124	Daily Seq. No.: 2	MAPCO
3. Inspector Address			4. Firm Address
EPA 1200 6th Ave, M/S ES-098 Seattle, WA 98101			1100 H+H Lane North Pole, AK 99705

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

Receipt of the document(s) and/or sample(s) described is hereby acknowledged:

No.	Description
1	Set of MSDS
1	1989-92 Manifests
1	Site diagram
1	Spill reports 1991-92
1	Tank list + Volumes
1	Biannual Reports
1	part remediation + section 3 + appendix 3 of spill plan.
+	~~adjusted financial responsibility for Compliance order~~

Optional:
Duplicate or split samples: Requested and Provided ☐ Not Requested ☐

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature		Recipient Signature	
Name: D. Douglas Smith		Name: William H. Mullow	
Title: Sr. Compliance Investigator	Date Signed: 5/13/93	Title: Environmental Coordinator	Date Signed: 5/13/93

EPA 7740-1 Rev (8-91)

Facility

E.P.A.

LEGEND
- SUMP OR FILTER
- DRAIN
- CONTAINED AREA
- DIRECTION OF DRAINAGE

TO CITY SEWER
Admin. Bldg.
To Pipe Line
DRINKING WATER WELL
ADMIN BLDG.
WAREHOUSE #1
SUBSTATION
HOT OIL SUP TANK
920 NIS
04-3
COOLING TOWER
02/04-4
02/04-2
#2 Crude unit 1984/1985
#1 Crude unit 1977
05-10
TEL. TANK
BLENDING/METERING BUILDING
02-1
925 NIS
FIRE STATION BUILDING
LAB
923
05-7
CHEM. GEN. BLDG.
924
CONTROL BLDG.
F/S-11
908
901
HEATER
903
NOTE: AREAS OUTSIDE OF CONTAINMENTS ARE FLAT WITH NO DEFINED DRAINAGE GRADE.
UTILITY BLDG
914
T-190
T 192
T 189
905
907
EFFLUENT BUILDING
T-65576 NALCO 5841
T-65577 NALCO 5196
SULFOLANE T-194
T 191 FOUR WAY DEPRESSANT
909A
909B
LAG-05900B N.I.S.
LAG-05900C
LAG-05900A
WAREHOUSE #3 DRUM STORAGE
T 616
T 618
T 617
T 619
F/S-05102
F/S-05103
05-9
T 513
T 514
T 511
T 510
921
F/S-12
T 193
T 515
T 508
TANK WATER DRAIN
T 403
T 404
T 509
T 505
FSII TANK
F/S-14A
F/S-14B
913
F/S-05101
F/S-7
F/S-8
F/S-10
904
F/S-9
05-8
05-11
F/S-13A
F/S-13B
922
T 820
T 821
T 823
T 822
F/S------
F/S------
T 402
T 302
T 901
T 401
T 501
T 303
T 101
T 11E
TANK WATER DRAIN
201
DISTRIBUTION BUILDING
902
RAIL LOAD RACK
65736 ASPHALT PAVE BOND
TRUCK LOAD RACK
TO CITY OF NORTH POLE, ALASKA SEWAGE TREATMENT PLANT
old tank farm, all storage area

REFERENCE DRAWINGS			REVISIONS					ISSUE RECORD				
REF NO.	TITLE	DRAWING NO.	REV	DATE	BY	APPR	DESCRIPTION	ISSUE NO	DATE	REV	TO	FOR
			3	3/29/87	S.JP		DRAWN ON CADD					
			2	1/6/87	S.JP		ADD NEW LAGOON					
			1	12/4/86	S.JP		ADD DRAINAGE					
			0	7/1/86	S.VH		ADD LAG-05900C AND LINE TO CITY SEWER					

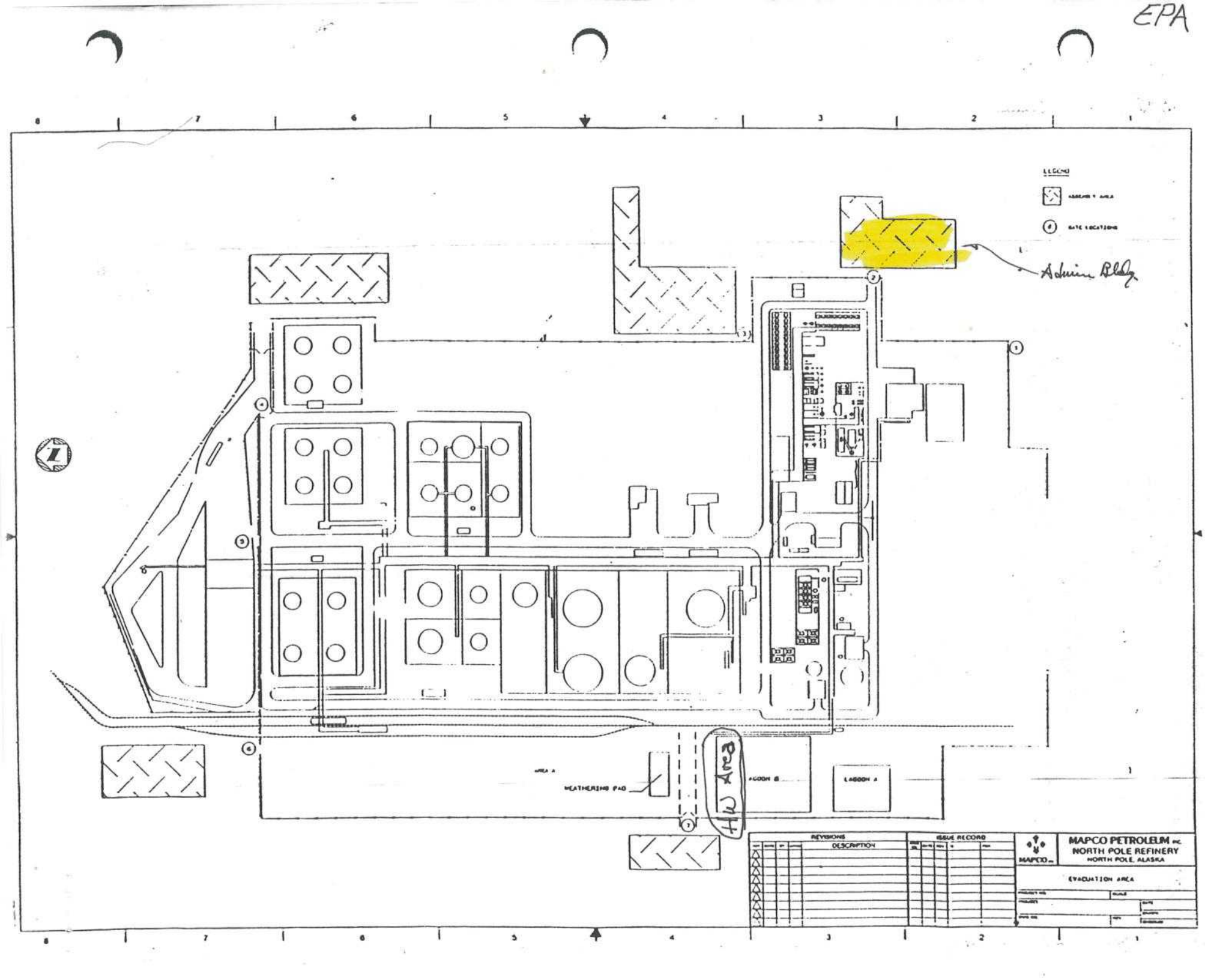
MAPCO INC.

MAPCO ALASKA PETROLEUM INC.
NORTH POLE REFINERY
NORTH POLE, ALASKA

SUMP LOCATION
PLOT PLAN

PROJECT NO.
SCALE N.T.S.
PROJECT
DATE 29 MAR 87
DRAWN S.JP
DRAWING NO. D-00-F1342
REV. 3
CHECKED

EPA


LEGEND
Admin Bldg
WEATHERING PAD
LAGOON B
LAGOON A
H2 Area
REVISIONS
DESCRIPTION
ISSUE RECORD
MAPCO PETROLEUM INC.
NORTH POLE REFINERY
NORTH POLE, ALASKA
EVACUATION AREA

EPA
5/13/93
1 of 3

CO-033
MAPCO ALASKA PETROLEUM INC.

1100 H&H LANE
NORTH POLE, ALASKA 99705
(907) 488-2741

February 26, 1993

Mr. Mike Oden
Chairman, LEPC
UAF Risk Management
1000 University Avenue
Fairbanks, AK 99775

Re: 1992 Hazardous Chemical Inventory Reporting

Dear Mr. Oden,

In accordance with 40 CFR §370.25, attached is MAPCO ALASKA PETROLEUM Inc.'s North Pole Refinery's Tier II Emergency and Hazardous Chemical Inventory Forms.

Sincerely,

David C. Rowse

David C. Rowse
Refinery General Manager
MAPCO ALASKA PETROLEUM Inc.

DCR:bel

Attachments

cc: K. McCullom
J. Taylor

MRL-1

CO-035
MAPCO ALASKA PETROLEUM INC.
1100 H&H LANE
NORTH POLE, ALASKA 99705
(907) 488-2741

February 26, 1993

Mr. Barry Jennings
North Pole Fire Department
P.O. Box 55109
North Pole, AK 99705

Re: 1992 Hazardous Chemical Inventory Reporting

Dear Mr. Jennings,

In accordance with 40 CFR §370.25, attached is MAPCO ALASKA PETROLEUM Inc.'s North Pole Refinery's Tier II Emergency and Hazardous Chemical Inventory Forms.

Sincerely,

David C. Rowse

David C. Rowse
Refinery General Manager
MAPCO ALASKA PETROLEUM Inc.

DCR:bel

Attachments

cc: K. McCullom
J. Taylor

MRL-1

CO-033
MAPCO ALASKA PETROLEUM INC.
1100 H&H LANE
NORTH POLE, ALASKA 99705
(907) 488-2741

February 26, 1993

Camille Stephens
Alaska Emergency Response Coordinator
Alaska Dept. of Environmental Conservation
410 Willoughby Avenue, Suite 105
Juneau, AK 99801-1795

Re: 1992 Hazardous Chemical Inventory Reporting

Dear Ms. Stephens,

In accordance with 40 CFR §370.25, attached is MAPCO ALASKA PETROLEUM Inc.'s North Pole Refinery's Tier II Emergency and Hazardous Chemical Inventory Forms.

Sincerely,

David C. Rowse

David C. Rowse
Refinery General Manager
MAPCO ALASKA PETROLEUM Inc.

DCR:bel

Attachments

cc: K. McCullom
J. Taylor

MRL-1